

EXHIBIT 31

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	
	:	
ALL PARTS	:	Case No.: 12-MD-02311
	:	Honorable Marianne O. Battani
THIS RELATES TO: ALL CASES	:	
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	:	
	:	
	:	
	:	

**DECLARATION OF STEFANO LUIGI SALVINI IN SUPPORT OF
FIAT CHRYSLER FINANCE NORTH AMERICA, INC.'s OPPOSITION TO THE
PARTIES' MOTION TO COMPEL**

I, Stefano Luigi Salvini, hereby declare under penalty of perjury as follows:

1. I am President, Chief Executive Officer, Secretary and Director of Fiat Chrysler Finance North America, Inc. ("Fiat Finance"). Unless otherwise noted, the facts set forth herein are based on my personal knowledge.

2. I have reviewed the subpoena served on Fiat Finance. I have also reviewed the Parties' Motion to Compel Discovery from Non-Party Original Equipment Manufacturers ("Op. Br."). I understand the serving Parties seek information in response to the following requests to the extent not available from FCA US LLC ("FCA"): 1(a)-(g), (l), (m); 3; 4(a)(1)-(2); 4(a)(3)(a)-(e), (h), (k); 4(a)(4), (7), (8), (13); 4(b), (e), (h), (j); 5; 13; 14(c); 15; 16; 22; 23(2); 27; 28 (last two sentences); 30; 33; and 34. *See* Op. Br. 2 n. 6.¹

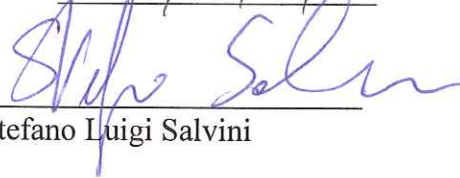
¹ I also understand that certain Parties are seeking documents in response to Request 31, which seeks "all documents relating to negotiations or communications with defendants [and others]" relating to this lawsuit.

3. The parties seek documents and data concerning (a) purchases of auto parts and (b) the manufacture and sale of motor vehicles. While the requests are incredibly broad, Fiat Finance has no involvement in either of these activities. Nor does it provide financing or credit to consumers. In fact, it does not provide consumer-facing services at all. Rather, it performs cash management, investment, corporate finance services, and working capital financing for FCA Group companies in the North American region.

4. Accordingly, Fiat Finance does not possess data or documents relating to the purchase of auto parts or the sale of vehicles in the United States, and it certainly does not possess any such information that is not also found with FCA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of February, 2016 at New York, NY.


Stefano Luigi Salvini